

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:20-cr-699 RLW (NAB)
JACKIE MATTHEWS,)	
)	
Defendants.)	

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Jackie Matthews, by and through counsel, and moves this Court pursuant to 18 U.S.C. 3145 § (a)(2) to modify condition (f) of the conditions of release imposed on November 16, 2020 by allowing him to travel outside of the district for a new employment opportunity as a truck driver. In support of this motion, Defendant states as follows:

1. Defendant is charged with a two counts related to deprivation of civil rights and the filing of a false report.
2. On November 16, 2020, this Court admitted Defendant to bail on a combination of conditions of release, determining that the conditions imposed would reasonably assure both his appearance at trial and the safety of the community.
3. Condition (f) is among the conditions imposed by this Court. Condition (f) restricts Defendant's travel to the Eastern District of Missouri.
4. Defendant has been seeking employment for a considerable period and is struggling to make ends meet.

5. Defendant has found an opportunity as a truck driver with Abundant Trucking. This position, however, would require him to travel out of state.
6. If permitted to accept the position, Defendant would communicate his itinerary in advance with the pretrial services office.
7. Defendant has adhered to all of his conditions of release for nearly one year without a violation.
8. Defendant, through counsel, has discussed this matter with Pretrial Services Officer, Anna Gagliarducci. Ms. Gagliarducci has no objection to Defendant's request.
9. Defendant, through counsel, has also discussed this matter with assistant United States attorney, Sirena Wissler. Ms. Wissler has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court modify the conditions of release imposed on November 16, 2020 by allowing him to travel outside of the district for a new employment opportunity as a truck driver.

Respectfully submitted,

By: /s/ Marc Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Sirena Wissler, assistant United States attorney.